

Reviewer

Manying Xue, Chemist -

RAB3/HED (7509C)

Date: 07/22/04

Approved by

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Date: 07/22/04

This DER was originally prepared under contract by Dynamac Corporation (20440 Century Boulevard, Suite 100; Germantown, MD 20874; submitted 02/26/2004). The DER has been reviewed by the HED and revised to reflect current OPP policies.

## **STUDY REPORT:**

45596211 Haughey, D.; Abdel-Baky, S. (2002) Magnitude of BAS 510 F and BAS 500 F Residues in Dry and Succulent Peas: Final Report: Lab Project Number: 2001/5003246: 66696: F200112. Unpublished study prepared by BASF Agro Research. 95 p.

### **EXECUTIVE SUMMARY:**

BASF Corporation has submitted field trial data on dried shelled peas, succulent shelled peas, and succulent edible-podded peas. A total of 20 dry and succulent pea field trials were conducted during the 2001 growing season. Nine trials (5 U.S. trials and 4 Canadian trials) were conducted on dried shelled peas in Regions 5 (ND; 1 trial), 11 (ID, OR, and WA; 4 trials), and 14 (AB and SK, Canada; 4 trials); eight trials (7 U.S. trials and 1 Canadian trial) were conducted on succulent shelled peas in Regions 1 (PA; 1 trial), 2 (GA and NC; 2 trials), 5 (MN and WI; 3 trials), 11 (WA, 1 trial), and 5B (QC, Canada; 1 trial); and three trials were conducted in the U.S. on succulent edible-podded peas in Regions 5 (MN; 1 trial), 11 (WA; 1 trial), and 12 (OR; 1 trial).

At each test location a total of two broadcast foliar spray applications of the 20% BAS 500 F WG formulation were made at ~0.2 lb ai/A/application with a 4- to 6-day retreatment interval, for a total seasonal rate of ~0.4 lb ai/A. Applications were made using ground equipment in a spray volume of ~10-36 gal/A of water with a spray adjuvant added to the spray mixture. The 20% WG pyraclostrobin formulation used in the dried and succulent pea field trials also contained another experimental active ingredient (BAS 510 F) as part of the tank-mix; data for the BAS 510 active ingredient are not reviewed herein. Samples of dried shelled peas were harvested 20-22 days and succulent shelled peas and succulent edible-podded peas were harvested 6-8 days following the last of two broadcast foliar applications from all test sites.

The harvested samples were analyzed by BASF Agro Research (Research Triangle Park, NC) for residues of pyraclostrobin and its metabolite BF 500-3 using LC/MS/MS, BASF Method Number D9908. The limit of quantitation (LOQ) was 0.02 ppm for each analyte (pyraclostrobin and BF 500-3) in/on dried shelled peas, succulent shelled peas, and succulent edible-podded peas. This method is adequate for data collection based on acceptable concurrent method recovery data.



The maximum storage intervals of crop samples from harvest to analysis were 138 days (4.5 months) for dried shelled peas, 224 days (7.4 months) for succulent shelled peas, and 163 days (5.4 months) for succulent edible-podded peas. No storage stability data have been submitted with this petition. Available storage stability data indicated that residues of pyraclostrobin and its metabolite BF 500-3 are relatively stable under frozen storage conditions in/on fortified samples of grape juice, sugar beet tops and roots, tomatoes, and wheat grain and straw for up to 25 months, and in/on fortified samples of peanut nutmeat and processed oil for up to 19 months. The storage stability data can be translated to support the storage intervals for dry and succulent peas for this study (D269668, etc., L. Cheng, 11/28/2001).

The results of the dried and succulent pea field trials show that the maximum combined residues of pyraclostrobin and its metabolite BF 500-3 were: (i) <0.10 ppm in/on treated samples of dried shelled peas harvested at 20- to 22-day PHIs; (ii) <0.10 ppm in/on treated samples of succulent shelled peas harvested at 7- to 8-day PHIs; and (iii) 0.36 ppm in/on treated samples of succulent edible-podded peas harvested at 6- to 7-day PHIs.

### STUDY/WAIVER ACCEPTABILITY/DEFICIENCIES/CLARIFICATIONS:

Under the conditions and parameters used in the study, the field trial residue data are classified as scientifically acceptable. The acceptability of this study for regulatory purposes is addressed in the forthcoming U.S. EPA Residue Chemistry Summary Document, DP Barcode D281042.

### **COMPLIANCE:**

Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided. No deviations from regulatory requirements were reported which would have an impact on the validity of the study.

## A. BACKGROUND INFORMATION

Pyraclostrobin is a fungicide that is structurally related to the naturally occurring strobilurins, compounds derived from some fungal species. Pyraclostrobin is also in the same chemical class as azoxystrobin (PC 128810), registered for many crops and turf/lawn, and trifloxystrobin (PC 129112) which recently was granted a "reduced risk" status as a fungicide on many crops. The biochemical mode of action of these compounds is inhibition of electron transport in pathogenic fungi.



| TABLE A.1. Test C         | ompound Nomenclature  |
|---------------------------|---|
| Compound                  | Chemical Structure  Cl—  N  O  N  CH <sub>3</sub> O  CH <sub>3</sub>  |
| Common name               | Pyraclostrobin  |
| Company experimental name | BAS 500 F   |
| IUPAC name                | methyl N-{2-[1-(4-chlorophenyl)-1H-pyrazol-3-yloxymethyl]phenyl}(N-methoxy)carbamate  |
| CAS name                  | methyl [2-[[[1-(4-chlorophenyl)-1H-pyrazol-3-yl]oxy]methyl]phenyl]methoxycarbamate  |
| CAS#                      | 175013-18-0   |
| End-use product/EPs       | 20% water dispersible granular formulation (WG; product name: Cabrio™ EG Fungicide; EPA Reg. No. 7969-187/EPA File Symbol 7969-RIT) |

Pyraclostrobin technical is a white to light beige solid.

| TABLE A.2. Physicochemical Properti               | es   |                        |
|---|--|------------------------|
| Parameter   | Value  | Reference <sup>1</sup> |
| Melting point                                     | 63.7-65.2 °C   | D269848 & D274191      |
| Density   | 1.285g/cm3 at 20°C   | D269848 & D274191      |
| Water solubility ( 20°C)                          | 2.41 mg/L in deionized water at 20°C<br>1.9 mg/L in buffer system pH 7 at 20°C<br>2.3 mg/L in buffer system pH 4 at 20°C<br>1.9 mg/L in buffer system pH 9 at 20°C   | D269848 & D274191      |
| Solvent solubility (mg/L at 20°C)                 | acetone (≥160 mg/L); methanol (11 mg/L);<br>2-propanol (3.1 mg/L); ethyl acetate (≥160 mg/L); acetonitrile (≥76 mg/L);<br>dichloromethane (≥110 mg/L); toluene<br>(≥100 mg/L); n-heptane (0.36 mg/L); 1-<br>octanol (2.4 mg/L); olive oil (2.9 mg/L);<br>DMF (≥62 mg/L). | D269848 & D274191      |
| Vapour pressure at 25°C                           | 2.6 x 10 <sup>-10</sup> hPa (at 20°C); 6.4 x 10 <sup>-10</sup> hPa   | D269848 & D274191      |
| Dissociation constant (pK <sub>a</sub> )          | Does not dissociate in water. There are no dissociable moieties.   | D269848 & D274191      |
| Octanol/water partition coefficient $Log(K_{ow})$ | n-Octanol/water partition coefficient (K <sub>ow</sub> ) at room temperature (=K <sub>ow</sub> of 3.80, pH 6.2; =log K <sub>ow</sub> 4.18, pH 6.5).  | D269848 & D274191      |

Product Chemistry data were reviewed by the Registration Division (D269848 and D274191, 5/3/01, 5/15/01, and 6/7/01, S. Malak)



### B. EXPERIMENTAL DESIGN

# **B.1.** Study Site Information

| Trial Identification     | Cail al           | haracteris     |           |                | Metagralagi                               | ical data                                   |  |      |              |           |
|--------------------------|-------------------|----------------|-----------|----------------|---|---|--|------|--------------|-----------|
| (County, State; Year)    | <del></del>       |                |           |                | Meteorolog                                | <del></del>                                 |  |      |              |           |
| (County, State, 1 car)   | Туре              | %OM            | pН        | CEC            | Overall monthly rainfall range (inches) i | Overall temperature range (°C) <sup>2</sup> |  |      |              |           |
| Peas, Dried Shelled      |                   |                | •         |                |   |   |  |      |              |           |
| Cass, ND; 2001           | Silty clay        | No             | t applic  | able           | Not reported                              | 23.9-24.4                                   |  |      |              |           |
| Grant, WA; 2001          | Loamy sand        | No             | t applic  | able           | Not reported (I)                          | 17.8-33.3                                   |  |      |              |           |
| Grant, WA; 2001          | Sandy loam        | No             | t applic  | able           | Not reported (I)                          | 22.2-34.4                                   |  |      |              |           |
| Umatilla, OR; 2001       | Silt loam         | No             | t applic  | able           | Not reported (I)                          | 18.3-30.6                                   |  |      |              |           |
| Payette, ID; 2001        | Loam              | No             | t applic  | able           | Not reported (I)                          | 26.1-27.8                                   |  |      |              |           |
| Edmonton, AB; 2001       | Clay Ioam         | No             | t applic  | able           | Not reported                              | 22.2-27.8                                   |  |      |              |           |
| Wetaskiwin, AB; 2001     | Loam              | Not applicable |           |                | Not reported                              | 17.2-28.9                                   |  |      |              |           |
| Hoodoo, SK; 2001         | Silty loam        | Not applicable |           |                | Not reported                              | 10.0-26.7                                   |  |      |              |           |
| RM 463, SK; 2001         | Loam              | Not applicable |           |                | Not reported                              | 13.3-15.0                                   |  |      |              |           |
| Peas, Succulent Shelled  | <u> </u>          |                |           |                | <del></del>                               |   |  |      |              |           |
| Lehigh, PA; 2001         | Silt loam         | No             | t applica | able           | Not reported (I)                          | 20.0-21.7                                   |  |      |              |           |
| Wake, NC; 2001           | Sandy loam        | Not applicable |           | Not applicable |   | Not applicable                              |  | able | Not reported | 16.1-23.9 |
| Grady, GA; 2001          | Loamy sand        | No             | t applica | able           | Not reported                              | 11.1-21.7                                   |  |      |              |           |
| Freeborn, MN; 2001       | Loam              | No             | t applica | able           | Not reported                              | 15.6-30.6                                   |  |      |              |           |
| Wilkin, MN; 2001         | Clay loam         | No             | t applica | able           | Not reported                              | 25.0-28.9                                   |  |      |              |           |
| Pepin, WI; 2001          | Sandy loam        | No             | t applica | able           | Not reported (I)                          | 18.9-28.3                                   |  |      |              |           |
| Grant, WA; 2001          | Sandy loam        | No             | t applica | able           | Not reported (I)                          | 15.6-28.9                                   |  |      |              |           |
| Haut-Richelieu, QC; 2001 | Silty loam        | No             | t applica | able           | Not reported                              | 14.4-26.7                                   |  |      |              |           |
| Peas, Succulent, Edible  | Podded            | <u> </u>       |           |                | <del></del>                               | <del>-</del>                                |  |      |              |           |
| Steele, MN; 2001         | Loam              | No             | t applica | able           | Not reported                              | 21.7-31.1                                   |  |      |              |           |
| Grant, WA; 2001          | Coarse sandy loam | No             | t applica | able           | Not reported (I)                          | 16.7-28.9                                   |  |      |              |           |
| Benton, OR; 2001         | Silty clay loam   | No             | t applica | able           | Not reported (I)                          | 17.8-18.3                                   |  |      |              |           |

<sup>(</sup>I) indicates that supplemental irrigation was received.

The petitioner did not include any information pertaining to weather conditions over the course of the field trials except to describe the conditions which occurred during application of the test substance and whether irrigation was used.

<sup>&</sup>lt;sup>2</sup> Air temperature was only provided for days of application.



| TABLE B.1.2.                       | Stud | ly Use Pattern.  |                |                   |                | ···                     |                     |  |
|------------------------------------|------|--|----------------|-------------------|----------------|-------------------------|---------------------|--|
| Location                           | EP1  |  |                |                   |                |                         | Tank Mix            |  |
| (County, State/<br>Province; Year) |      | Method; Timing   | Vol.<br>(GPA²) | Rate<br>(lb ai/A) | RTI³<br>(days) | Total Rate<br>(lb ai/A) | Adjuvants           |  |
|                                    |      | Peas, Dried Shel   | led            |                   |                |                         |                     |  |
| Cass, ND; 2001                     | 20%  | 1: Broadcast foliar; mature plants                             | 10.48          | 0.21              | 5              | 0.42                    | Activator 90        |  |
|                                    | WG   | 2: Broadcast foliar; pod drying 10.27 0.205                    |                |                   |                |                         |                     |  |
| Grant, WA;                         | 20%  | 1: Broadcast foliar; post bloom                                | 20.1           | 0.2               | 5              | 0.40                    | Induce              |  |
| 2001                               | WG   | 2: Broadcast foliar; 21 days before harvest                    | 20             | 0.2               | ļ              |                         |                     |  |
| Grant, WA;                         | 20%  | 1: Broadcast foliar; 75% mature                                | 20.1           | 0.2               | 5              | 0.40                    | Induce              |  |
| 2001                               | WG   | 2: Broadcast foliar; 90% mature, beginning to dry              | 19.9           | 0.2               |                |                         |                     |  |
| Umatilla, OR; 20%                  |      | 1: Broadcast foliar; late bloom, pod fill                      | 19.45          | 0.195             | 5              | 0.40                    | Agridex             |  |
| 2001                               | WG   | 2: Broadcast foliar; pod fill                                  | 20.80          | 0.208             |                |                         |                     |  |
| Payette, ID;                       | 20%  | 1: Broadcast foliar; end of bloom                              | 30             | 0.201             | 5              | 0.40                    | R-11                |  |
| 2001                               | WG   | 2: Broadcast foliar; end of bloom                              | 29.8           | 0.199             |                |                         |                     |  |
| Edmonton, AB;                      | 20%  | 1: Broadcast foliar; pods are 75% full size 11.66 0.198 5 0.40 |                |                   |                | 0.40                    | Merge               |  |
| 2001                               | WG   | 2: Broadcast foliar; pods mature                               | 11.73          | 0.199             |                | <br>                    | ļ                   |  |
| ′ 1                                | 20%  | 1: Broadcast foliar; mature pods                               | 11.79          | 0.199             | 6              | 0.40                    | Merge               |  |
|                                    | WG   | 2: Broadcast foliar; mature pods                               | 11.57          | 0.196             |                | }                       | !                   |  |
| ′ ′ (                              | 20%  | 1: Broadcast foliar; pods at full maturity                     | 11.7           | 0.199             | 6              | 0.40                    | Merge               |  |
| 2001                               | WG   | 2: Broadcast foliar; 30-40% of pods dried                      | 11.77          | 0.200             |                |                         |                     |  |
| RM 463, SK;                        | 20%  | 1: Broadcast foliar; 50% pod maturity                          | 11.67          | 0.199             | 5              | 0.40                    | Merge               |  |
| 2001                               | WG   | Broadcast foliar; 50% of pods final size 11.71 0.199           |                |                   |                |                         |                     |  |
|                                    |      | Peas, Succulent Sh   | elled          |                   | ·              | ·                       | L                   |  |
| Lehigh, PA;                        | 20%  | 1: Broadcast foliar; pod set                                   | 35.6           | 0.203             | 4              | 0.41                    | Penetrator          |  |
| 2001                               | WG   | 2: Broadcast foliar; late bloom/mid pod set                    | 36.2           | 0.207             |                | [                       |                     |  |
| Wake, NC;                          | 20%  | 1: Broadcast foliar; pod fill/blooming                         | 30.6           | 0.204             | 5              | 0.40                    | X-77                |  |
| 2001                               | WG   | 2: Broadcast foliar; blooming/ pod fill                        | 30.06          | 0.2               |                | [                       |                     |  |
| Grady, GA;                         | 20%  | 1: Broadcast foliar; pod fill                                  | 10.7           | 0.2               | 5              | 0.40                    | Latron CS-7         |  |
| 2001                               | WG   | 2: Broadcast foliar; pod fill                                  | 10.2           | 0.2               |                | <u> </u>                |                     |  |
| Freeborn, MN;                      | 20%  | 1: Broadcast foliar; podding                                   | 17.7           | 0.2               | 4              | 0.40                    | Crop Oil            |  |
| 2001                               | WG   | 2: Broadcast foliar; pod fill                                  | 15.88          | 0.2               |                |                         | Plus                |  |
| Wilkin, MN;                        | 20%  | 1: Broadcast foliar; BBCH71                                    | 20.06          | 0.2               | 4              | 0.40                    | Agri-dex            |  |
| 2001                               | WG   | 2: Broadcast foliar; 70% of pods typical length                | 20.09          | 0.2               |                | ]                       |                     |  |
| epin, WI; 2001 20% WG              |      | Broadcast foliar; pod fill beginning, end     of flowering     | 20.3           | 0.203             | 5              | 0.40                    | Class<br>Preference |  |
|                                    |      | 2: Broadcast foliar; approximately 50% pod filling             | 20.1           | 0.201             |                |                         |                     |  |



Pyraclostrobin/BAS 500 F/PC Code 099100/BASF Corporation DACO 7.4.1/OPPTS 860.1500/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Dry and Succulent Peas

| TABLE B.1.2.                       | Stud | ly Use Pattern.                             |   |        |                |                         |           |  |
|------------------------------------|------|---|---|--------|----------------|-------------------------|-----------|--|
| Location                           | EP1  |   |   |        |                |                         | Tank Mix  |  |
| (County, State/<br>Province; Year) |      | Method; Timing                              | Vol. Rate (GPA <sup>2</sup> ) (lb ai/A) |        | RTI³<br>(days) | Total Rate<br>(lb ai/A) | Adjuvants |  |
| Grant, WA;                         | 20%  | 1: Broadcast foliar; 50% mature pods        | 20.1                                    | 0.2    | 5              | 0.40                    | Induce    |  |
| 2001 W                             | WG   | 2: Broadcast foliar, 75% mature pods        | 20.1                                    | 0.2    |                |                         |           |  |
| / L                                | 20%  | 1: Broadcast foliar; first flower open      | 25.7                                    | 0.203  | 6              | 0.40                    | Surf 92   |  |
|                                    | WG   | 2: Broadcast foliar; pods developing        | 24.8                                    | 0.197  |                |                         |           |  |
|                                    |      | Peas, Succulent, Edib                       | le Podde                                | d      |                | ·                       |           |  |
| Steele, MN;                        | 20%  | 1: Broadcast foliar; podding                | 17.05                                   | 0.202  | 4              | 0.40                    | Crop Oil  |  |
| 2001                               | WG   | 2: Broadcast foliar; podding                | 17.8                                    | 0.2    |                |                         | Plus      |  |
| Grant, WA;                         | 20%  | 1: Broadcast foliar; full bloom             | 20.2                                    | 0.2    | 5              | 0.40                    | Induce    |  |
| 2001 V                             | WG   | 2: Broadcast foliar; full bloom plus 7 days | 20.1                                    | 0.2    | 0.2            |                         |           |  |
| Benton, OR;                        | 20%  |   |   | 0.202  | 4              | 0.40                    | Agri-dex  |  |
| 2001                               | WG   | 2: Broadcast foliar; pod filling            | 20.20                                   | 0.2017 |                |                         |           |  |

<sup>&</sup>lt;sup>1</sup> EP = End-use Product

<sup>&</sup>lt;sup>3</sup> RTI = Retreatment Interval

| TABLE B.1.3.            | T         |             | ocogi apin      | cai Eocatioi |            |                 |           | <del></del> |                            |  |  |  |
|-------------------------|-----------|-------------|-----------------|--------------|------------|-----------------|-----------|-------------|----------------------------|--|--|--|
|                         |           | Peas        |                 |              |            |                 |           |             |                            |  |  |  |
| NAFTA Growing<br>Region | Peas      | , dried she | lled            | Peas,        | edible poo | ided            | Peas,     | Succulent   | shelled                    |  |  |  |
|                         |           | Req         | uested          | Submitted    | Requested  |                 |           | Re          | quested                    |  |  |  |
|                         | Submitted | Canada      | US <sup>1</sup> |              | Canada     | US <sup>2</sup> | Submitted | Canada      | US <sup>3</sup>            |  |  |  |
| 1                       |           |             |                 |              | i          |                 | 1         |             | I in either<br>zone 1 or 2 |  |  |  |
| 2                       |           |             |                 |              |            |                 | 2         | ·           |                            |  |  |  |
| 5                       | 1         |             |                 | 1            |            | -               | 3         |             | 3                          |  |  |  |
| 5B                      |           |             |                 |              |            |                 | 1         |             |                            |  |  |  |
| 11                      | 4         |             |                 | I            |            |                 | 1         |             | 1                          |  |  |  |
| 12                      |           |             |                 | 1            |            |                 |           |             | 1                          |  |  |  |
| 14                      | 4         |             |                 |              |            |                 |           |             |                            |  |  |  |
| Total                   | 9         |             | 5               | 3            |            | 3               | 8         |             | 0.00                       |  |  |  |

According to OPPTS 860.1500, Table 4, the required number of field trials for one dried cultivar of shelled pea (*Pisum* spp.) as a representative commodity of the crop "group" Peas [40 CFR 180.1(h)] is five. According to OPPTS 860.1500, Table 6, trial regions are not specifically recommended for dried shelled peas, but are based on the acreage and production of dried garden pea (97% U.S. crop production in Region 11)

<sup>&</sup>lt;sup>2</sup> GPA = Gallons per acre

According to OPPTS 860.1500, Table 4, the required number of field trials for one succulent cultivar of edible-podded pea (*Pisum* spp.) as a representative commodity of the crop "group" Peas [40 CFR 180.1(h)] is three. Regions are not recommended for crops requiring  $\leq 3$  trials.

<sup>&</sup>lt;sup>3</sup> According to OPPTS 860.1500, Table 4, the required number of field trials for one succulent cultivar of shelled pea (*Pisum* spp.) as a representative commodity of the crop "group" Peas [40 CFR 180.1(h)] is six; trial locations as recommended in OPPTS 860.1500, Table 5, for succulent garden peas.



# **B.2.** Sample Handling and Preparation

Samples of dried shelled peas were harvested 20-22 days and samples of succulent shelled peas and succulent edible-podded peas were harvested 6-8 days following treatment. A single untreated and duplicate treated samples were collected from each trial. Samples were bagged and stored frozen (temperature not specified) on the day of harvest, and shipped frozen within 0-43 days of harvest to BASF Agro Research (Research Triangle Park, NC) for analysis.

# **B.3.** Analytical Methodology

Samples of dried shelled peas, succulent shelled peas, and succulent edible-podded peas were analyzed for residues of pyraclostrobin and its metabolite BF 500-3 using LC/MS/MS, BASF Method Number D9908. A brief description of the method was included in the submission. BASF Method Number D9908 is similar to the proposed enforcement method (LC/MS/MS BASF Method Number D9808) submitted in conjunction with a previous pyraclostrobin petition (PP#0F06139; DP Barcodes D269668, etc., L. Cheng, 11/28/01). Method D9908 used an alternate extraction option: samples of dried shelled peas, succulent shelled peas, and succulent edible-podded peas were extracted with methanol:water:2 N HCl (7:2.5:0.5; v:v:v) instead of methanol:water (7:3; v:v). Residues are analyzed by LC/MS/MS. For quantitation, the product/daughter ion for the transition m/z 388  $\rightarrow$  194 for pyraclostrobin (BAS 500 F) and m/z 358  $\rightarrow$  164 for BAS 500-3 are measured. The limit of quantitation (LOQ) was 0.02 ppm for each analyte (pyraclostrobin and BF 500-3) in/on dried shelled peas, succulent shelled peas, and succulent edible-podded peas.

# C. RESULTS AND DISCUSSION

Sample storage conditions and intervals are summarized in Table C.2. The maximum storage intervals of crop samples from harvest to analysis were 138 days (4.5 months) for dried shelled peas, 224 days (7.4 months) for succulent shelled peas, and 163 days (5.4 months) for succulent edible-podded peas. No storage stability data have been submitted with this petition. Available storage stability data indicated that residues of pyraclostrobin and its metabolite BF 500-3 are relatively stable under frozen storage conditions in/on fortified samples of grape juice, sugar beet tops and roots, tomatoes, and wheat grain and straw for up to 25 months, and in/on fortified samples of peanut nutmeat and processed oil for up to 19 months. The storage stability data can be translated to support the storage intervals for dry and succulent peas for this study (D269668, etc., L. Cheng, 11/28/2001).

Concurrent method recovery data are presented in Table C.1. Samples of dried shelled peas, succulent shelled peas, and succulent edible-podded peas were analyzed for residues of pyraclostrobin and its metabolite BF 500-3 using LC/MS/MS, BASF Method Number D9908. The method LOQ was 0.02 ppm for each analyte. This method is adequate for data collection based on acceptable concurrent method recovery data. Apparent residues of pyraclostrobin and its metabolite BF 500-3 were each below the method LOQ (<0.02 ppm) in/on all untreated samples of dried shelled peas, succulent shelled peas, and succulent edible-podded peas



Residue data from the dry and succulent pea field trials are reported in Table C.3. A summary of residue data for dried shelled peas, succulent shelled peas, and succulent edible-podded peas following treatment with the 20% WG formulation is presented in Table C.4. The combined residues of pyraclostrobin (BAS 500 F) and its metabolite BF 500-3 ranged from <0.04 ppm to <0.10 ppm in/on dried shelled peas and succulent shelled peas, and 0.11 ppm to 0.36 ppm in/on edible-podded peas reflecting the use of pyraclostrobin with two broadcast foliar applications of the 20% WG formulation at a seasonal rate of ~0.4 lb ai/A, a 4- to 6-day retreatment interval, and a 20- to 22-day PHI for dried shelled peas and 6- to 8-day PHI for succulent shelled peas and edible-podded peas.

A total of 20 dry and succulent pea field trials were conducted during the 2001 growing season. Nine trials were conducted on dried shelled peas encompassing Regions 5 (ND; 1 trial), 11 (ID, OR, and WA; 4 trials), and 14 (AB and SK, Canada; 4 trials); eight trials were conducted on succulent shelled peas encompassing Regions 1 (PA; 1 trial), 2 (GA and NC; 2 trials), 5 (MN and WI; 3 trials), 11 (WA, 1 trial), and 5B (QC, Canada; 1 trial); and three trials were conducted on succulent edible-podded peas encompassing Regions 5 (MN; 1 trial), 11 (WA; 1 trial), and 12 (OR; 1 trial). The number of field trials are in accordance with OPPTS Guideline 860.1500.

|                             |                                   |                 | strobin and its Metabo<br>culent edible-podded). | lite BF 500-3 from |
|-----------------------------|-----------------------------------|-----------------|--|--------------------|
| Matrix                      | Spike level (ppm)                 | Sample size (n) | Recoveries (%)                                   | Mean ± std dev     |
| Pyraclostrobin              | · · · · · · · · · · · · · · · · · |                 |  |                    |
| Dried shelled pea           | 0.02                              | 2               | 105, 110   | 100 ± 9            |
|                             | 1.0                               | 2               | 90, 96   | 7                  |
| Succulent shelled pea       | 0.02                              | 2               | 90, 90   | 91 ± 1             |
|                             | 1.0                               | 2               | 91, 92   | 7                  |
| Succulent edible-podded pea | 0.02                              | 1               | 100  | 105                |
|                             | 5.0                               | 1               | 110  | 7                  |
| BF 500-3                    |                                   |                 |  |                    |
| Dried shelled pea           | 0.02                              | 2               | 110, 115   | $104 \pm 10$       |
|                             | 1.0                               | 2               | 93, 99   | 7                  |
| Succulent shelled pea       | 0.02                              | 2               | 90, 90   | 89 ± 3             |
|                             | 1.0                               | 2               | 84, 90   | 7                  |
| Succulent edible-podded pea | dible-podded pea 0.02             |                 | 95   | 102                |
|                             | 5.0                               | ı               | 109  | 7                  |



| TABLE C.2. S                    | Summary of Storage Conditions. |                                      |   |  |  |  |  |  |
|---------------------------------|--------------------------------|--------------------------------------|---|--|--|--|--|--|
| Matrix<br>(RAC or Extract)      | Storage<br>Temp. (°C)          | Actual Storage Duration <sup>1</sup> | Interval of Demonstrated Storage Stability <sup>2</sup>   |  |  |  |  |  |
| Dried Shelled Pea               | <-10                           | 86-138 days (2.8-4.5 months)         | The available storage stability data indicate that residues of pyraclostrobin and its metabolite BF 500-3   |  |  |  |  |  |
| Succulent Shelled Per           | <-10                           | 123-224 days (4.0-7.4 months)        | are relatively stable under frozen storage conditions in/on fortified samples of grape juice, sugar beet tops and roots, tomatoes, and wheat grain and straw for up |  |  |  |  |  |
| Succulent Edible-<br>Podded Pea | <-10                           | 154-163 days (5.1-5.4 months)        | to 25 months, and in/on fortified samples of peanut nutmeat and processed oil for up to 19 months.  |  |  |  |  |  |

All pea samples were analyzed within 0-2 days of extraction.

<sup>&</sup>lt;sup>2</sup> Refer to storage stability data reviewed in conjunction with a previous pyraclostrobin petition (PP#0F06139; DP Barcode D269668,etc., L. Cheng, 11/28/01).

| TABLE C.3.                         | Residu | e Data from I                       | Ory and Succu          | lent Pea Fi             | ield Tri | als with Pyracl | ostrobin.    |              |  |
|------------------------------------|--------|-------------------------------------|------------------------|-------------------------|----------|-----------------|--------------|--------------|--|
| Trial ID                           | Region | Crop; Variety                       | Commodity or<br>Matrix | Total Rate<br>(lb ai/A) | PHI      | Residues (ppm)  |              |              |  |
| (County, State/<br>Province; Year) |        |                                     | Manix (10 duzz) (6     |                         | (days)   | Pyraclostrobin  | BF 500-3     | Total        |  |
|                                    |        |                                     | Pea,                   | Dried Shelle            | d        |                 |              |              |  |
| Cass, ND; 2001                     | 5      | Dry pea;<br>Athos                   | Shelled pea<br>seed    | 0.42                    | 20       | <0.02, <0.02    | <0.02, <0.02 | <0.04, <0.04 |  |
| Grant, WA;<br>2001                 | 11     | Dry pea;<br>Lazer                   | Shelled pea<br>seed    | 0.40                    | 21       | 0.02, 0.04      | <0.02, <0.02 | <0.04, <0.06 |  |
| Grant, WA;<br>2001                 | 11     | Dry pea;<br>Estancia                | Shelled pea<br>seed    | 0.40                    | 21       | <0.02, 0.02     | <0.02, <0.02 | <0.04, <0.04 |  |
| Umatilla, OR;<br>2001              | 11     | Dry pea; Paso                       | Shelled pea<br>seed    | 0.40                    | 22       | <0.02, <0.02    | <0.02, <0.02 | <0.04, <0.04 |  |
| Payette, ID;<br>2001               | 11     | Dry pea;<br>09690470                | Shelled pea<br>seed    | 0.40                    | 21       | 0.02, 0.02      | <0.02, <0.02 | <0.04, <0.04 |  |
| Edmonton, AB;<br>2001              | 14     | Dry pea;<br>Admiral                 | Shelled pea<br>seed    | 0.40                    | 21       | 0.03, 0.03      | <0.02, <0.02 | <0.05, <0.05 |  |
| Wetaskiwin,<br>AB; 2001            | 14     | Dry pea;<br>Croma                   | Shelled pea<br>seed    | 0.40                    | 21       | 0.05, 0.08      | <0.02, <0.02 | <0.07, <0.10 |  |
| Hoodoo, SK;<br>2001                | 14     | Dry pea;<br>Delta                   | Shelled pea<br>seed    | 0.40                    | 21       | 0.05, 0.06      | <0.02, <0.02 | <0.07, <0.08 |  |
| RM 463, SK;<br>2001                | 14     | Dry pea;<br>Delta                   | Shelled pea<br>seed    | 0.40                    | 20       | 0.04, 0.04      | <0.02, <0.02 | <0.06, <0.06 |  |
| <del></del>                        | -      |                                     | Pea, Su                | cculent She             | lled     | <del></del>     | ·            | <del></del>  |  |
| Lehigh, PA;<br>2001                | 1      | Succulent pea; Wando                | Shelled pea<br>seed    | 0.41                    | 7        | <0.02, <0.02    | <0.02, <0.02 | <0.04, <0.04 |  |
| Wake, NC; 2001                     | 2      | Succulent<br>pea; Green<br>Arrow    | Shelled pea<br>seed    | 0.40                    | 7        | <0.02, <0.02    | <0.02, <0.02 | <0.04, <0.04 |  |
| Grady, GA;<br>2001                 | 2      | Succulent<br>pea; Progress<br>No. 9 | Shelled pea<br>seed    | 0.40                    | 7        | 0.07, 0.08      | <0.02, <0.02 | <0.09, <0.10 |  |
| Freeborn, MN;<br>2001              | 5      | Succulent pea; Knight               | Shelled pea<br>seed    | 0.40                    | 7        | <0.02, <0.02    | <0.02, <0.02 | <0.04, <0.04 |  |



| TABLE C.3.                         | Residue Data from Dry and Succulent Pea Field Trials with Pyraclostrobin. |                                |                     |            |               |                |                |              |  |  |  |
|------------------------------------|---|--------------------------------|---------------------|------------|---------------|----------------|----------------|--------------|--|--|--|
| Trial ID                           | Region  | Crop; Variety                  |                     | Total Rate | PHI<br>(days) | j              | Residues (ppm) |              |  |  |  |
| (County, State/<br>Province; Year) |   |                                | Matrix              | (lb ai/A)  |               | Pyraclostrobin | BF 500-3       | Total        |  |  |  |
| Wilkin, MN;<br>2001                | 5   | Succulent pea; Top pod         | Shelled pea<br>seed | 0.40       | 7             | <0.02, <0.02   | <0.02, <0.02   | <0.04, <0.04 |  |  |  |
| Pepin, WI; 2001                    | 5   | Succulent<br>pea; Lazor        | Shelled pea<br>seed | 0.40       | 8             | 0.03, 0.04     | <0.02, <0.02   | <0.05, <0.06 |  |  |  |
| Grant, WA;<br>2001                 | 11  | Succulent<br>pea; Case<br>Load | Shelled pea<br>seed | 0.40       | 7             | <0.02, <0.02   | <0.02, <0.02   | <0.04, <0.04 |  |  |  |
| Haut-Richelieu,<br>QC; 2001        | 5B  | Succulent<br>pea; XP 353       | Shelled pea<br>seed | 0.40       | 7             | 0.05, 0.06     | <0.02, <0.02   | <0.07, <0.08 |  |  |  |



| TABLE C.3.                                     | Residu | e Data from I                           | Ory and Succu        | lent Pea F            | ield Tri | als with Pyraclo | ostrobin.      |            |  |  |
|--|--------|---|----------------------|-----------------------|----------|------------------|----------------|------------|--|--|
| Trial ID                                       | Region | Crop; Variety                           |                      | i                     | PHI      | R                | Residues (ppm) |            |  |  |
| (County, State/<br>Province; Year)             |        | <br>                                    | Matrix               | Matrix (lb ai/A) (day |          | Pyraclostrobin   | BF 500-3       | Total      |  |  |
| <u>.                                      </u> |        |   | Pea, Succu           | lent Edible-          | Podded   |                  | <u> </u>       |            |  |  |
| Steele, MN;<br>2001                            | 5      | Succulent<br>pea; Casiadia              | Pod with pea<br>seed | 0.40                  | 6        | 0.23, 0.30       | 0.05, 0.06     | 0.28, 0.36 |  |  |
| Grant, WA;<br>2001                             | 11     | Succulent<br>pea; Sugar<br>Snap         | Pod with pea<br>seed | 0.40                  | 7        | 0.09, 0.10       | 0.02, 0.02     | 0.11, 0.12 |  |  |
| Benton, OR;<br>2001                            | 12     | Succulent<br>pea; Snap pea<br>SP704-3-8 | Pod with pea<br>seed | 0.40                  | 7        | 0.12, 0.19       | 0.07, 0.09     | 0.19, 0.28 |  |  |

| TABLE C.4.            | Summary of        | Residue | Data from Dr   | y and | Succul | ent Pea | Crop Fie          | eld Trials w                    | ith Pyracl      | ostrobin. |
|-----------------------|-------------------|---------|----------------|-------|--------|---------|-------------------|---------------------------------|-----------------|-----------|
| Commodity             | Total Applic.     |         |                |       |        |         | Residue I         | evels (ppm)                     | _               |           |
|                       | Rate<br>(lb ai/A) | (days)  |                | n     | Min.   | Max.    | HAFT <sup>1</sup> | Median<br>(STMdR <sup>2</sup> ) | Mean<br>(STMR³) | Std. Dev. |
| Dried Shelled<br>Pea  | 0.40-0.42         | 20-22   | pyraclostrobin | 18    | <0.02  | 0.08    | 0.07              | 0.03                            | 0.03            | 0.02      |
|                       |                   |         | BF 500-3       | 18    | <0.02  | 0.02    | 0.02              | <0.02                           | < 0.02          | 0.0       |
|                       |                   |         | Total          | 18    | <0.04  | <0.10   | 0.09              | 0.05                            | 0.05            | 0.02      |
| Succulent             | 0.40-0.41         | 7-8     | pyraclostrobin | 16    | <0.02  | 0.08    | 0.08              | 0.02                            | 0.03            | 0.02      |
| Shelled Pea           |                   |         | BF 500-3       | 16    | <0.02  | <0.02   | <0.02             | <0.02                           | < 0.02          | 0.0       |
|                       | ] ]               |         | Total          | 16    | <0.04  | <0.10   | 0.10              | 0.04                            | 0.05            | 0.02      |
| Succulent             | 0.40              | 6-7     | pyraclostrobin | 6     | 0.09   | 0.30    | 0.27              | 0.16                            | 0.17            | 0.08      |
| Edible-<br>Podded Pea | ĺ                 |         | BF 500-3       | 6     | 0.02   | 0.09    | 0.08              | 0.06                            | 0.05            | 0.03      |
| 1 00000               |                   |         | Total          | 6     | 0.11   | 0.36    | 0.35              | 0.24                            | 0.22            | 0.10      |

<sup>&</sup>lt;sup>1</sup> HAFT = Highest Average Field Trial.

### D. CONCLUSION

The combined residues of pyraclostrobin (BAS 500 F) and its metabolite BF 500-3 ranged from <0.04 ppm to <0.10 ppm in/on dried shelled peas and succulent shelled peas, and 0.11 ppm to 0.36 ppm in/on edible-podded peas reflecting the use of pyraclostrobin with two broadcast foliar applications of the 20% WG formulation at a seasonal rate of ~0.4 lb ai/A, a 4- to 6-day retreatment interval, and a 20- to 22-day PHI for dried shelled peas and 6- to 8-day PHI for succulent shelled peas and edible-podded peas.

<sup>&</sup>lt;sup>2</sup> STMdR = Supervised Trial Median Residue.

<sup>&</sup>lt;sup>3</sup> STMR = Supervised Trial Mean Residue.



## E. REFERENCES

DP Barcodes: D269668, D272771, D272789, D274095, D274192, D274471, D274957,

D275843, and D278429

Subject: PP#0F06139. PC Code 099100. Pyraclostrobin on Various Crops: Bananas

(import), Barley, Berries, Bulb Vegetables, Citrus Fruits, Cucurbit Vegetables, Dried Shelled Pea & Bean (except Soybean), Fruiting Vegetables, Grapes, Grass, Peanut, Pistachio, Root Vegetables (except Sugar Beet), Rye, Snap Beans, Stone Fruits, Strawberry, Sugar Beet, Tree Nuts, Tuberous and Corm Vegetables, and Wheat. Review of Analytical Methods and Residue Data. EPA File Symbols:

7969-RIT, 7969-RIA. CAS #175013-18-0.

From:

L. Cheng

To:

C. Giles-Parker/J. Bazuin

Dated:

11/28/01

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45399401, and 45429901

## F. DOCUMENT TRACKING

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